

Message

From: Shea, Valois [Shea.Valois@epa.gov]
Sent: 2/9/2017 5:56:50 PM
To: Chin, Lucita [Chin.Lucita@epa.gov]
Subject: FW: Updated Dewey Burdock Briefing Document

Valois

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From: Minter, Douglas
Sent: Wednesday, February 01, 2017 9:35 AM
To: Green, Holly <Green.Holly@epa.gov>
Cc: Shea, Valois <Shea.Valois@epa.gov>; Garcia, Bert <Garcia.Bert@epa.gov>; O'Connor, Darcy <oconnor.darcy@epa.gov>
Subject: RE: Updated Dewey Burdock Briefing Document

Hi Holly: in response to your question, here are the details we provided our RA during a November briefing. Valois and I can help with specific questions about these:

- Permit Requirements new to the ISR industry based on existing EPA UIC regulations:
 - These Class III permit requirements are based on existing EPA regulations. 40 CFR § 144.52(a)(9) states: “The Director *shall* impose on a case-by-case basis such additional conditions as are necessary to prevent the migration of fluids into underground sources of drinking water.”
 - The requirements are new to the industry, which has been regulated by state programs up till now. This is EPA’s first Class III Uranium ISR permit. We included these requirements to demonstrate that no ISR contaminants will cross the AE boundary into USDWs. State permits have not required this demonstration.
 - The permit requires Powertech to submit a post-restoration monitoring plan, which includes designating the location of post-restoration monitoring wells.
 - The permit requires post-restoration monitoring at monitoring wells that are located up-gradient from the AE boundary and downgradient from the restored wellfield. Powertech has the option to wait until restored wellfield groundwater reaches the line of monitoring wells under the natural groundwater flow rate or pump the wells to bring the restored wellfield groundwater to the monitoring wells more quickly.
 - The permit has requirements to monitor not only the monitoring wells impacted by an excursion, but also the nearest monitoring wells to the excursion-impacted monitoring well to identify if an

excursion plume is expanding. The permit requires that additional monitoring wells be installed downgradient from an expanding excursion plume to verify the excursion will not cross the AE boundary.

Douglas

From: Green, Holly
Sent: Wednesday, February 01, 2017 6:43 AM
To: Minter, Douglas <Minter.Douglas@epa.gov>
Subject: FW: Updated Dewey Burdock Briefing Document

Thanks again, Douglas. Peter is meeting with Mike Shapiro today and wants to give a heads up on this after all. One thing in the paper caught my eye that they may want more info on- can you explain a little about this statement? Or maybe just give an example?

Thank you!

- These permits will be the first EPA has directly issued for uranium recovery, and include some UIC requirements that will be new to the uranium ISR industry to ensure adequate protection of underground sources of drinking water (USDWs).

Holly Sage Green
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From: Minter, Douglas
Sent: Thursday, January 26, 2017 5:03 PM
To: Green, Holly <Green.Holly@epa.gov>
Cc: O'Connor, Darcy <oconnor.darcy@epa.gov>; Garcia, Bert <Garcia.Bert@epa.gov>; Bahrman, Sarah <Bahrman.Sarah@epa.gov>; Shea, Valois <Shea.Valois@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>; Boydston, Michael <Boydston.Michael@epa.gov>
Subject: FW: Updated Dewey Burdock Briefing Document

Hi Holly: here is our updated briefing document on Dewey Burdock that you requested. Our key message to your senior leadership is that Region 8 is ready to move forward with issuing these draft permits and proposed AE decision, but wishes to ensure that HQ's need for additional coordination and internal discussion has been met first. Towards this end, if you believe it would be helpful to have Darcy O'Connor, our Assistant Regional Administrator for the Office of Water Protection, communicate directly with her HQs counterparts, just let me know.

Let us know if you have any questions, etc., and thanks for your support in moving this up through OW.

Douglas

From: Green, Holly
Sent: Tuesday, January 24, 2017 2:46 PM
To: Minter, Douglas <Minter.Douglas@epa.gov>
Subject: RE: Updates on NDIC and Dewey Burdock

Perfect- thank you!

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From: Minter, Douglas
Sent: Tuesday, January 24, 2017 4:43 PM
To: Green, Holly <Green.Holly@epa.gov>
Subject: RE: Updates on NDIC and Dewey Burdock

Great question: we are updating the briefing document we prepared for our call with Gina in late November and will share that with you asap.

From: Green, Holly
Sent: Tuesday, January 24, 2017 2:31 PM
To: Minter, Douglas <Minter.Douglas@epa.gov>
Subject: RE: Updates on NDIC and Dewey Burdock

Thanks, Douglas. I will put the DB Q to Anita and Peter ASAP and get back to you. Can you please send me any updated briefing materials you have, specifically how the issues raised at the last set of briefings were resolved, or not?

Much appreciated,
Holly

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From: Minter, Douglas
Sent: Tuesday, January 24, 2017 4:25 PM
To: Green, Holly <Green.Holly@epa.gov>
Subject: Updates on NDIC and Dewey Burdock

Holly: thanks for your time on the phone yesterday.

Here are a couple of updates:

NDIC: We sent them the draft oversight report on December 22nd and asked for comments by January 18th. The State reviewed our draft report but asked for more time to prepare their written comments. To inform their response, they would like to meet with us as a next step. Our management has agreed and we expect to travel to Bismarck in March.

Dewey Burdock: with the advent of the new administration, our Acting RA, Deb Thomas, asked that we contact our HQs counterparts to let you know we are prepared to proceed with Class III and V draft permit issuance. However, we would

like HQs input on what additional coordination or internal discussion needs to occur first. Towards this end, could I ask you to communicate this question up your management chain on this Regional priority? If you prefer, I could also ask Darcy O'Connor to reach out to the OW front office. Let me know what communication approach you think might be most effective given what is going on in HQs during this very busy time.

Thanks!

Douglas